

LAW OFFICES
WILLIAMS & CONNOLLY^{LLP}

BENJAMIN HAZELWOOD
(202) 434-5159
BHAZELWOOD@wc.com

680 MAINE AVENUE SW
WASHINGTON, DC 20024
(202) 434-5000
WWW.WC.COM

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

September 20, 2023

Via ECF

Hon. Valerie Figueredo
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States ex rel. Bassan v. Omnicare, Inc.*, No. 15 Civ. 4179 (CM) (VF)

Dear Judge Figueredo:

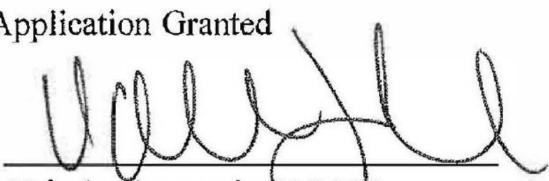
Pursuant to Rule I.g of Your Honor's Individual Practices and the Protective Order in this matter (Dkt. No. 102), we write respectfully on behalf of Defendants to request the Court's permission to file under seal all exhibits to their letter responding to the government's motion (Dkt. No. 242).

As the government laid out in its recent letter motion to seal, *see* Dkt. No. 339, the Protective Order provides a process for filing under seal certain documents designated as subject to the Protective Order, *see* Dkt. No. 102, ¶ 19. In following that process, Defendants request that the Court grant leave to file Exhibits 1–13 to their response letter under seal, as Defendants are the producing parties for all materials cited as exhibits. *See id.*

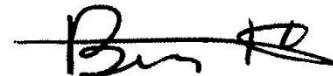
Defendants also respectfully request the Court seal the exhibits for which it granted a temporary 14-day seal. *See* Dkt. No. 343. Those materials have substantial overlap with the materials Defendants are requesting to file under seal in its letter response today. *See* Dkt. No. 102, ¶ 19.

We appreciate the Court's consideration.

Application Granted


Valerie Figueredo, U.S.M.J.
DATED: October 5, 2023

Sincerely,



Benjamin Hazelwood

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 345.